

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

Jessica DeRubbio et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

**THE DeRUBBIO PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., ("Goldman Declaration"), along with the exhibits appended, certain plaintiffs in the above-referenced matter who are identified on Exhibit A to the Goldman Declaration, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order awarding them: (1) judgment as to damages in the same amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer*, and other cases; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment for damages; (3) permission for such plaintiffs to seek punitive damages, economic damages, and other appropriate damages at a later date; and (4) for all other plaintiffs in this action not appearing on Exhibit A to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on May 28, 2019. *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570, ECF 4563.

Respectfully submitted,

/s/ Jerry S. Goldman

ANDERSON KILL P.C.

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

1251 Avenue of the Americas

New York, NY 10020

Tel: 212-278-1000

Fax: 212-278-1733

Email: jgoldman@andersonkill.com

Arthur R. Armstrong, Esq. (*pro hac vice*)

1760 Market Street, Suite 600

Philadelphia, PA 19103

Tel: 267-216-2711

Fax: 215-568-4573

Email: aarmstrong@andersonkill.com

Dated: New York, New York
August 1, 2019

Attorneys for Plaintiffs